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*Attorneys for Plaintiff Helen Armstrong*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

HELEN ARMSTRONG,

Plaintiff,

v.

TERRY REYNOLDS, Deputy Director of Nevada Division of Business and industry in his individual capacity; STEVE GEORGE, administrator of the Nevada Division of Industrial Relations in his individual capacity; JESS LANKFORD, Chief Administrative Officer of Nevada OSHA in his individual capacity; and LARA PELLEGRINI, Whistleblower Chief Investigator of Nevada OSHA in her individual capacity; DOES I through X, unknown individuals, and ROES xi through XX, entities, government agencies, corporations, or other companies and/or businesses currently unknown,

Defendants.

CASE NO.: 2:17-cv-02528-APG-DJA

**MOTION FOR EXTENSION OF TIME TO  
FILE VERIFIED PETITION AND  
DESIGNATION OF LOCAL COUNSEL**

Plaintiff Helen Armstrong, by and through the law firm of PISANELLI BICE PLLC, hereby requests an extension of time for the filing of the Verified Petition and Designation of Local Counsel of Counsel Phillip Spector until July 16, 2022.

On June 2, 2022, the Court issued a Notice to Counsel Pursuant to Local Rule IA 11-2 ordering Counsel Phillip Spector to comply with completion and filing of the Verified Petition and Designation of Local Counsel by June 16, 2022. Counsel has sent for the required Certificates

1 from the clerk of the supreme court or highest admitting court of each of the three states in which  
 2 the applicant has been admitted to practice law (District of Columbia, Maryland and  
 3 Pennsylvania). However, as of the time of this filing this motion, Counsel has received only two  
 4 of those Certificates. These Certificates are necessary to complete and file the Verified Petition  
 5 with the Court.

6 Plaintiff therefore respectfully requests an additional thirty (30) days until July 16, 2022  
 7 for Counsel Phillip Spector to file the Verified Petition and Designation of Local Counsel.  
 8 Counsel will file his Verified Petition along with the Certificates promptly after receiving all three  
 9 Certificates from the respective courts. Counsel will not appear on any documents until the  
 10 Verified Petition is submitted and approved.

11 DATED this 16th day of June 2022.

12 PISANELLI BICE PLLC

13  
 14 By: /s/ Debra L. Spinelli  
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21 *Attorneys for Plaintiff Helen Armstrong*

22 IT IS SO ORDERED:

23 Dated: June 17, 2022

24  
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 26 ANDREW P. GORDON  
 27 UNITED STATES DISTRICT JUDGE  
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